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Survey Request--Chemical Recovery Co., Elyria, Ohio

ORIGINAL SIGNED BY DALE S. BRYSON

Sandra S. Gardebring
Director, Enforcement Division

William H. Sanders III
Director, Surveillance & Analysis Division

Confirming the conversation on November 2, 1979, between Jon Barney of my staff and both A.R. Winklhofer of the Eastern District Office (EDO) and Charles Elly of the Central Regional Laboratory (CRL), I am requesting that an Enforcement priority sampling inspection be conducted at the subject facility.

The facility, located at 142 Locust Street, Elyria, Ohio, is engaged in spent chemical recovery operations. It does not have a NPDES permit, however, spills, run-off, or leachate reportedly have been discharged to the Black River.

The scope of the survey should be as follows:

I. General Inspection

1) Determine the general condition of the facility giving emphasis to sources of spills, run-off, or leachate and presence of hazardous conditions like presence of flammable and/or explosive materials, incompatible chemicals stored together, etc. Photographs should be taken to document the observations. Also, a rough sketch of the facility should be prepared showing the location of the prominent features.

2) Identify and provide an accurate description of operations at the plant such as:

a. The significant plant operations including identities of chemicals present in the plant that may cause imminent hazard conditions. Provide details as to number of drums or tanks, their capacities, the identities and amount of chemicals stored. If possible obtain a list of the sources, identities and amounts of chemicals received at the plant during the past year.

b. Pollution abatement practices in the plant. Also, provide a simplified flow diagram of the total water system showing all significant wastewater sources (process, cooling, sanitary, storm, floor drains, and miscellaneous), wastewater treatment unit operations, and flow path(s) from the source(s) to the receiving stream.

3. Assess the extent of environmental damage caused by the facility, especially to receiving water, drinking water supplies, if any, and the safety and health of nearby residents. A rough inspection and observation of aquatic life present upstream and downstream from the plant should be made, if possible. Estimate the possible clean-up procedures that may be required of the company.

II. Sampling

The following samples should be collected:

a. A maximum of six* grab water samples of leachate or run-off or discharge coming from the facility; or standing water with potential for connecting with the receiving stream or contaminating ground water.

b. A maximum of six* samples of chemicals from tanks & barrels found in the plant, if necessary to document improper or hazardous practices, including possible violations of the polychlorinated biphenyl (PCB) marking and disposal regulations under the Toxic Substances Control Act.

c. A maximum of four* surface soil grab samples on the plant property if necessary to document suspected spills or improper disposal.

d. Two water samples from the receiving stream-one upstream and one downstream of the facility.

e. Two sediment samples from the receiving stream --- one upstream and one downstream of the facility.

III. Analysis

The samples should be analyzed as follows:

a. The samples in II(a), (c), (d), and (e) for total ICAP metals plus arsenic and mercury. Any water samples with non-detectible lead or cadmium by ICAP should be reanalyzed by graphite furnace AA for these metals.

b. The samples in II(e) and possibly up to 5 additional samples selected from those in II(a), (b), and (c), depending on observations made during the inspection, quantitatively for PCB by Aroclor number.

c. The samples in II(a), (c,) (d), and (e) quantitatively by GC-MS for all identifiable compounds present at analytically significant concentrations in the base-neutral fractions (water samples or acetone-hexane extracts (soil or sediment samples).

d. The samples in II(b) quantitatively for any major base-neutral constituents (present at levels equal to or quarter than 1%) and quantitatively for any minor constituents which can be identified readily.

e. The samples in II(a) and (d) for BOD, COD, pH, TOC, and TSS.

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* If during the inspection additional samples are judged to be needed, then they should be collected. Decisions as to which samples to analyze will be made following completion of the survey, as necessary.

As soon as the results are available copies should be forwarded to Leon Acierto, Compliance & Engineering Section, and Jon Barney, Permit Assistance Section. Any questions on the survey should be directed to Mr. Acierto at 353-2110. Questions regarding analysis of samples or scheduling at CRL should be directed to Mr. Barney at 886-5109.

Thank you for your assistance.

cc: A.R. Winklhofer, EDO
Curtis Ross, CRL

bcc: Gardebring/Bryson
Grimes/Schulteis/Phelus
Muno
[redacted]/HMS File
Leder/Messenger
C&ES File
Pratt/Barney
Acierto

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